

EXHIBIT E

Dynamic's Objections to HMMA's Deposition Designations (Key's deposition)

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1 A. Yes.

2 Q. Who was that?

3 A. Gloria Robinson.

4 Q. Do you know what company assigned you?

5 Ms. Robinson worked for Dynamic; right?

6 A. Yes.

7 Q. So were you assigned by Dynamic?

8 A. Yes.

9 (Defendants' Exhibit 6 was marked
10 for identification.)

11 Q. I'll show you what's marked as
12 Defendants' Exhibit Number 6.

13 So I'm showing you what's marked as
14 Defendants' Exhibit Number 6. I represent that
15 this is a diagram of the first floor of the
16 Administration Building. And you see in the
17 lower left-hand corner, near the lower left-hand
18 corner, it says "mail room"?

19 A. Yes.

20 Q. Is that, in your recollection, is that
21 where the mail room was in this building, if you
22 remember?

23 A. I don't remember.

24 Q. When did you first learn that your
25 assignment to the mail room position at Hyundai

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1 Motor Manufacturing, Alabama would end?

2 A. August 1st.

3 Q. And how did you learn that?

4 A. Ray Cureton.

5 Q. And what specifically did he tell you?

6 A. "They don't want you out there."

7 Q. Did he say who "they" were?

8 A. Gloria Robinson.

9 Q. Anyone else?

10 A. He just said her by name.

11 Q. And did he say why she didn't want you
12 out there?

13 A. Because of my hair and something else.

14 Q. Did he say what something else was?

15 A. He said he didn't want to get into it.

16 Q. And that's the extent of what he said
17 about the reason?

18 A. Yes.

19 Q. Did anyone else give you a reason why
20 your assignment was ending?

21 A. No.

22 Q. Did you speak to anyone else at Dynamic
23 about that?

24 A. No.

25 Q. How about at HEA?

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1 A. No.

2 Q. Did you speak to anybody at that class?

3 A. I said good morning.

4 Q. That's it?

5 A. Yes.

6 Q. So to your knowledge, what persons at
7 Dynamic knew you were pregnant?

8 A. Gloria Robinson, LaTonya -- or Tonya --
9 and Maurice Chambliss.

10 Q. To your knowledge, what persons at HEA
11 knew you were pregnant?

12 A. I don't know who worked for HEA.

13 Q. But you said Ms. Roberts -- excuse
14 me -- Ms. Williams --

15 A. I don't know who she worked for.

16 Q. Okay. Do you have any knowledge of
17 anybody who worked for Hyundai Motor
18 Manufacturing, Alabama knowing you were
19 pregnant?

20 A. I don't know who works for them.

21 Q. You've told me all the people you've
22 talked to about your pregnancy?

23 A. Yes.

24 Q. While you were out at the Hyundai Motor
25 Manufacturing, Alabama facility, what grooming

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1 A. No.

2 Q. (BY MR. MIDDLEBROOKS:) All right.

3 Let's look down this document. First page is
4 Bates Key 49. Last page is Bates Key 56. And
5 under item 2, midway down the page, "I believe I
6 was discriminated against by the following
7 organizations: (Check those that apply)." And
8 you checked "Employer" and "Other." And there
9 you write "Ms. Gloria Robinson and Ms. Cassandra
10 Williams." Do you see that?

11 A. Yes.

12 Q. And why did you choose to name those
13 two people?

14 A. Because those were the two people who I
15 felt discriminated against me.

16 Q. Anyone else?

17 A. Their employers.

18 Q. Then it says "Organization Name:" You
19 just have "Hyundai." Do you see that?

20 A. Yes.

21 Q. You realize that there are numerous
22 organizations that have the name Hyundai in it?

23 A. Yes, it's possible. I specified by
24 putting the address.

25 Q. Okay. It says "Name and title of

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1 immediate supervisor" down toward the bottom,
2 and that's Maurice -- you identified "Maurice
3 Chambliss"?

4 A. Yes.

5 Q. Then go to the next page. "Name and
6 titles of persons responsible," midway down the
7 page under A. Do you see that?

8 A. You say under A, the letter A?

9 Q. Yeah.

10 A. Yes. Okay. Yes.

11 Q. You say "Ms. Cassandra Williams" --
12 that's where I see "AMCO." You see that?

13 A. Yes, I see that.

14 Q. And do you remember why you put AMCO?

15 A. I don't remember why.

16 Q. And "Ms. Gloria Robinson." So you've
17 already answered those are the two people you
18 consider responsible?

19 A. And their employers.

20 Q. It says, "What reasons were given to
21 you for the acts you consider discriminatory"
22 and "By whom?" Do you see Number 7?

23 A. Yes.

24 Q. It says, "No reasons were given except
25 I was told the Koreans who own the company

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1 Q. Go down five sentences. It says
2 "without waiving this objection, plaintiff
3 states she interviewed at the Hyundai plant with
4 Gloria Robinson, Lieutenant Maurice Chambliss,
5 and Cassandra Williams on July 19th, 2017." Do
6 you see that?

7 A. Uh-huh.

8 Q. Is that yes?

9 A. Oh, I'm sorry.

10 Q. Yeah, that's all right.

11 A. Yes.

12 Q. Actually, we all do it.

13 A. Yes, I see that.

14 Q. Now, maybe my recollection is wrong.
15 Earlier you said you interviewed with Gloria
16 Robinson and Lieutenant Maurice Chambliss. But
17 on your initial interview, did you interview
18 with Cassandra Williams also?

19 A. No. She -- Gloria Robinson asked her a
20 question pertaining to my interview.

21 Q. Okay. So that was the extent of
22 Cassandra Williams's involvement in the
23 interview?

24 A. Yes.

25 Q. Okay.

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1 A. No.

2 Q. Look, if you would, at the end of the
3 first paragraph.

4 A. Uh-huh.

5 Q. It says -- you can feel free to read
6 all of it. It says "That same day, I was
7 informed by Dynamic Security, Inc., that
8 Ms. Williams did not want me to return to work."

9 Did I read that accurately?

10 A. That's -- yes.

11 Q. Okay. What is that referring to?

12 A. Me working at Hyundai, the site.

13 Q. Okay. When you said "I was informed by
14 Dynamic Security, Inc.," are you referring to
15 Ray Cureton here?

16 A. Ray Cureton and Gloria Robinson.

17 Q. Okay. Well, did Ms. Robinson tell you
18 that you were not going to be allowed to
19 continue to work at the site?

20 A. Through Ray Cureton.

21 Q. Through -- but Ms. Robinson didn't tell
22 you that you weren't going to be allowed to
23 continue to work at the site, did she?

24 A. She told Ray Cureton.

25 Q. She told Ray Cureton, who told you;

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1 right?

2 A. Yes.

3 Q. Okay. But this says "Ms. Williams did
4 not want me to return to work." Ms. Williams,
5 that's Cassandra Williams?

6 A. Yes.

7 Q. And she's a Hyundai Engineering
8 employee; right?

9 MS. PALMER: Object to form.

10 A. I mean, I don't know who she works for.

11 Q. (BY MR. REDMOND:) Okay. But she's not
12 a Dynamic Security employee, was she?

13 A. No.

14 Q. She worked for some Hyundai entity;
15 correct?

16 MR. MIDDLEBROOKS: Object to form.

17 A. I don't know who Cassandra Williams
18 worked for.

19 Q. (BY MR. REDMOND:) Am I reading what
20 you're saying here right? Ms. Williams was the
21 one that did not want you to return to work?

22 A. That's what it says, yes.

23 Q. Okay. And do you believe that's
24 accurate today?

25 A. Yes.

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1 little memos and they don't want African
2 Americans, you know, wearing their hair like
3 this because of the clientele they have.

4 And she specifically named Mayor Todd
5 Strange, who was the mayor at that time; that he
6 may not want to see me with my hair like this.

7 And she said that she has to have her
8 male counterparts at times speak with the Korean
9 higher-ups because they won't talk to her
10 because she's a female.

11 Q. And what had you done about your hair
12 on August 1?

13 A. I wore a hat and I -- that completely
14 covered my head.

15 Q. Do you have a picture -- do you happen
16 to have a picture of --

17 A. Of --

18 Q. -- of the hat that day with you --

19 A. No.

20 Q. -- wearing it? Do you still have the
21 hat?

22 A. I do.

23 Q. If you'd hold on to it.

24 All right. Anything else you can
25 recall her saying during that conversation?

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1 A. I asked her -- I -- you know, I said,
2 "Well, I wore a hat, you know, as you guys said
3 I should," and she said, "This is not about
4 that."

5 And she said, "Are you going to be this
6 way until" -- and she pointed to my stomach.

7 And then I -- she said -- like she
8 started inching forward towards me. She was
9 sitting in the chair I'm currently sitting in,
10 and I was sitting in the chair where the court
11 reporter's sitting in --

12 Q. Y'all were in this room?

13 A. Yes.

14 Q. Okay.

15 A. And she said, "Have you been
16 discriminated against," in like a loud, hostile
17 voice. And I said, "I wore a hat, you know, as
18 you guys asked me to."

19 She said, "This is not about that.
20 This is going to be a problem."

21 Q. Was it your understanding that she was
22 referring to your pregnancy?

23 A. Yes.

24 Q. And I know you were asked some
25 questions and you were shown, I think it was in

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1 A. No.

2 Q. Anyone employed with Dynamic made any
3 comments that indicate that they don't like
4 having pregnant women in the workplace?

5 A. Not to my knowledge, no.

6 Q. All right. So how did you leave it
7 with Mr. Cureton?

8 A. He said that he would follow up with, I
9 guess, his home office and he would get back
10 with me.

11 Q. And so you were going to return to the
12 office -- return to the Hyundai facility?

13 A. No, he told me that -- he asked for my
14 badge and he said that, you know, "They don't
15 want you out there." And I said, okay, and I,
16 you know, gave him my badge.

17 Q. And we may have talked about this
18 before. Did he ever say anything more about who
19 didn't want you out there?

20 A. He said Gloria Robinson didn't want me
21 out there. And when I asked him why, he said
22 because of my hair and something else.

23 Q. But he never told you what the
24 something else was?

25 A. He said he didn't want to get into it.

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1 A. What I had written initially with
2 the -- and submitted to the EEOC.

3 Q. I need to put -- I heard you use the
4 word -- the N-word this morning. That was
5 Nicole who told you you haven't been
6 discriminated against because they haven't used
7 that word against you?

8 A. She said that, "You haven't really been
9 discriminated against." She said, "I've been
10 called," and she said, "the N-word." She said,
11 "You haven't been called that. They didn't call
12 you that."

13 Q. And she's an African American also;
14 right?

15 A. Yes.

16 Q. When Ray Cureton told you they did not
17 want you at the facility anymore, did he
18 specifically mention Gloria Robinson by name?

19 A. That's who the -- when we were talking
20 and I was talking with him, that's who the
21 conversation was about. He was saying like,
22 "Oh, I've known her," and, "She's not like
23 that," and, you know, "They don't want you
24 there."

25 And he said like -- and I was like,

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1 "Who?" And he said, "Gloria Robinson." And
2 then I asked him, "Why?" He said, "Because of
3 your hair and something else."

4 Q. That's the only name he mentioned?

5 A. I don't remember exactly. I know he
6 mentioned her name.

7 Q. You testified that Ray Cureton -- that
8 you talked to Ray Cureton and Nicole about other
9 jobs, and they said they would let you know when
10 something was available. Were the two of them
11 together when that was said?

12 A. Every time I spoke with one, I --
13 except for the time when I asked Nicole about my
14 hair, he would have her there with him.

15 Q. Take a look at, if you would, at
16 Defendants' Exhibit 10, the handbook that was
17 given to you.

18 You said something after the break,
19 when Mr. Middlebrooks asked you if you had
20 anything to add, you added something about the
21 jury trial waiver. And I couldn't hear it very
22 well. Do you remember what it was that you --

23 A. I just -- it just -- I just said that
24 "It is the desire of Dynamic Security to resolve
25 disputes whenever possible in a fair and